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November 9, 2010

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street
New York NY 10017

Re: Shepard, et al v. The Associated Press, et al
Docket no: 10 CV 7551 (RJS)

Dear Judge Sullivan:

Our office is in receipt of your Order dated October 6, 2010. To date, none of the six (6) defendants have served or filed an Answer in this action.

It is respectfully requested that the time limitations stated in your order be extended pending service of Answers by all defendants.

Additionally, it is respectfully requested that the conference scheduled for November 19, 2010 be adjourned to a date sometime after the service of Answers by all defendants.

On a positive note, please be advised that the undersigned has spoken with the following attorneys representing the defendants listed below:

Andrew L. Deutsch, Esq.
DLA Piper
Attorneys for Defendants
Associated Press and ESPN

Michael Kuritzkes, Esq.
Philadelphia Media Network
Interim General Counsel
Attorney for Defendant Philly Online

Mark Lerner, Esq.
Satterlee Stephens Burke & Burke, LLP
Attorneys for Defendant
Photobucket,com, Inc.

Hillary Lane, Esq.
Vice President, Litigation
NBC Universal, Inc.
Attorneys for Defendant
Kurtis Productions, Ltd.

We have agreed that it is in the best interest of all the parties to schedule a meeting to discuss possible resolution of this matter. We will do so at a location outside the courthouse at a mutually convenient date and time.

Thank you for your attention in this matter.

Very truly yours,

/s/

CHARLES C. DESTEFANO

CCD: co

cc: Andrew L. Deutsch, Esq.

DLA Piper

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